

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

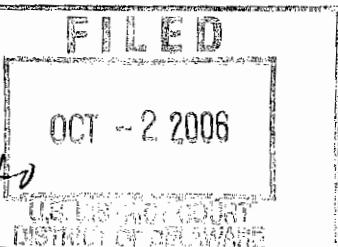
JAMES A. WILSON, ET AL.

PLAINTIFFS

V.

STANLEY TAYLOR, ET AL.

C.A. NO. 05-399-JJF

Plaintiff reply to defendants' answer, to
cross summary judgment motion

1. Patricia S. Ditto, stated in her Affidavit that Plaintiff was moved from the merit building to the medium security building.
2. She does not state the reason for the move, nor does she state if Plaintiff had any infractions that caused the move.
3. She does state that Plaintiff had to leave his job as an educational assistant because he was moved.
4. The Civil complaint that Plaintiff has in the District Court is about being moved without due process and that S.C.I is doing this to mostly black inmates

5. Plaintiff have a civil case against Lt Hollis, Corp. Stolzenbach who works in the meat building.
6. Plaintiff have filed restraining orders against such defendants requesting that he do not be moved or retaliated against.
7. Ms. Datto also states that Plaintiff was offered the opportunity to either work in the kitchen S.C.F. or transfer to the Greentree program at D.C.C. and that Plaintiff refuse.
8. The Warden and Deputy Warden are also in this complaint as defendants.
9. Plaintiff was moved for no reason except for retaliatory actions.

Therefore, Plaintiff should be granted
Summary Judgment

James A. Nelson
D.C.C.
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Smyrna, De. 19977

9/26/06

I hereby certify that on 9/22/06 I sent the following "Plaintiff Reply to defendant's Answer to Cross Summary Judgment motion to the following entities:

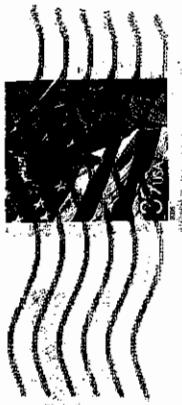
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S. P.